

# EXHIBIT A

SEIGEL CAPOZZI LAW FIRM LLC  
505 Goffle Road  
Ridgewood, New Jersey 07450  
Attorney for Plaintiffs  
(201) 444-4000

PAMELA WILLIAMS, as Administrator  
and Administrator Ad Prosequendum  
of the ESTATE OF LAWRENCE LEROY  
WILLIAMS and PAMELA WILLIAMS,  
Individually,

Plaintiffs

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: PASSAIC COUNTY

DOCKET NO.: PAS-L-289-15

Civil Action

v.

SUMMONS

ST. JOSEPH'S REGIONAL MEDICAL  
CENTER, DR. HOSSAIN, WALDEMAR  
SILVA, M.D., BENEDICTA JIMENEZ,  
R.N., MARY ANN YUMUL, R.N.,  
KATHLEEN HORTELANO, R.N., VALERIE  
SIFUENTES, PCA, JOHN DOE M.D. -1  
(ATTENDING PHYSICIAN AT  
APPROXIMATELY 9:30 P.M. ON  
3/16/2014), JOHN DOE, M.D.-1  
(Attending Physician at  
approximately 9:30 p.m. on  
3/16/2014) JOHN DOE, M.D.-2  
(Physician co-signing Dr. Hossain's  
3/17/12 note timed at 1:20 a.m.),  
JANE DOE, R.N.-1(Nurse involved at  
time Plaintiff hit his head on I.V.  
pole), JOHN DOE, M.D. 3-10, JANE  
DOE M.D. 1-5, JOHN DOE R.N. 1-5,  
JANE DOE, R.N. 2-5, JOHN DOE 1-10,  
JANE DOE 1-10, fictitious names  
whose present identities are  
unknown,

Defendants.

From The State of New Jersey, To The Defendants Named Above:

Waldemar Silva, M.D. c/o St. Joseph's Regional Medical Center

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this

complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the clerk of the Superior Court, Hughes Justice Complex, CN 971, Trenton, New Jersey 08625. A filing fee\* payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Michelle M. Smith /s/  
Michelle M. Smith, Clerk  
Superior Court of New Jersey

Dated: February 9, 2015

Name of Defendant to be Served: **Waldemar Silva, M.D. c/o St. Joseph's Regional Medical Center**

Address of the Defendant: **703 Main Street  
Paterson, New Jersey 07501**

\* \$105.00 For Chancery Division Cases or \$135.00 for Law Division Cases

RECEIVED and FILED  
Superior Court of New Jersey  
JAN 29 2015  
Passaic County

Douglas S. Grossbart, Esq.  
Attorney ID: 044681997  
SEIGEL CAPOZZI LAW FIRM, LLC  
505 Goffle Road  
Ridgewood, New Jersey 07450  
Telephone No.: 201-444-4000  
Facsimile No.: 201-444-7717  
Attorneys for Plaintiff

PAMELA WILLIAMS, as  
Administrator and  
Administrator Ad  
Prosequendum of the ESTATE OF  
LAWRENCE LEROY WILLIAMS, and  
PAMELA WILLIAMS,  
Individually,

Plaintiffs

v.

ST. JOSEPH'S REGIONAL MEDICAL  
CENTER, DR. HOSSAIN, WALDEMAR  
SILVA, M.D., BENEDICTA  
JIMENEZ, R.N., MARY ANN  
YUMUL, R.N., KATHLEEN  
HORTELANO, R.N., VALERIE  
SIFUENTES, PCA, JOHN DOE,  
M.D.-1 (Attending Physician  
at approximately 9:30 p.m. on  
3/16/2014), JOHN DOE, M.D. -  
2 (Physician co-signing Dr.

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION: PASSAIC COUNTY  
: DOCKET NO.: PAS -1- 289-15

Civil Action

: COMPLAINT AND JURY DEMAND,  
: AFFIDAVIT OF MERIT, DESIGNATION OF  
: TRIAL COUNSEL, DEMAND FOR  
: INSURANCE INFORMATION, DEMAND FOR  
: ANSWERS TO FORM C and C(3)  
: INTERROGATORIES, NOTICE TO  
: PRODUCE

Hossain's 3/17/14 note timed :  
at 1:20 a.m.), JANE DOE, R.N. :  
- 1 (Nurse involved at time :  
Plaintiff hit his head on I.V. :  
pole), JOHN DOE, M.D., 3-10, :  
JANE DOE, M.D. 1-5, JOHN :  
DOE, R.N. 1-5, JANE DOE, R.N., :  
2-5, JOHN DOE, 1-10, JANE DOE, :  
1 -10 AND ABC-XYZ CORPORATION :  
1-10, fictitious names whose :  
present identities are :  
unknown, :  
:

***Defendants.***

Plaintiff, PAMELA WILLIAMS, residing in Paterson, County of Passaic, by way of complaint against the defendants, says:

**FIRST COUNT**

1. The plaintiff, PAMELA WILLIAMS, is the Aunt of the plaintiff's decedent, LAWRENCE LEROY WILLIAMS, who died on March 24, 2014.
2. The plaintiff, PAMELA WILLIAMS, is the Administrator and Administrator Ad Prosequendum of the Estate of LAWRENCE LEROY WILLIAMS, late of Paterson, County of Passaic, who died on March 24, 2014.
3. Pamela Williams was appointed as Administrator ad Prosequendum on August 7, 2014.
4. On or about March 10, 2014, Lawrence Leroy Williams came under the care of the defendants, ST. JOSEPH'S REGIONAL MEDICAL

CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10,, fictitious names whose present identities are unknown.

5. At all relevant times, LAWRENCE LEROY WILLIAMS, was a patient of the defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present identities are unknown.

6. Defendant, ST. JOSEPH'S REGIONAL MEDICAL CENTER, is a corporation, company, hospital and/or other health care entity, located in the City of Paterson, County of Passaic, State of New

Jersey, who, through their agents, servants, employees and/or assignees, provides hospital, emergency, surgical and/or other medical care.

7. Defendant, DR. HOSSAIN, was, at all times relevant, a physician licensed by the state of New Jersey, whose specialty, if any, is currently unknown, and practicing, including at defendant, ST. JOSEPH'S REGIONAL MEDICAL CENTER.

8. Defendant, WALDEMAR SILVA, M.D., was, at all times relevant, a Physician licensed by the state of New Jersey and practicing in the specialty of Internal Medicine, including at defendant, ST. JOSEPH'S REGIONAL MEDICAL CENTER.

9. Defendants, BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., and KATHLEEN HORTELANO, R.N., were, at all times relevant, Registered Nurse(s) licensed by the state of New Jersey and practicing, including at defendant, ST. JOSEPH'S REGIONAL MEDICAL CENTER.

10. Defendant, VALERIE SIFUENTES, PCA, was, at all times relevant, a PCA, licensed by the state of New Jersey and practicing, including at defendant, ST. JOSEPH'S REGIONAL MEDICAL CENTER.

11. Defendant, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), was, at all times relevant, a Physician licensed by the state of New Jersey, whose specialty,



if any, is presently unknown, and practicing, including at defendant, ST. JOSEPH'S REGIONAL MEDICAL CENTER.

12. Defendant, JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), was, at all times relevant, a Physician licensed by the state of New Jersey, whose specialty, if any, is presently unknown, and practicing, including at defendant, ST. JOSEPH'S REGIONAL MEDICAL CENTER.

13. Defendant, JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), was, at all times relevant, a Registered Nurse(s) or other type of nurse, licensed by the state of New Jersey and practicing, including at defendant, ST. JOSEPH'S REGIONAL MEDICAL CENTER.

14. The defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present identities are unknown, negligently and carelessly failed to exercise the degree of care and skill required



of them in his/her/their treatment of Lawrence Leroy Williams, including but not limited to; the following deviations from generally accepted standards of care:

(a) The defendants failed to properly diagnose and/or timely treat Lawrence Leroy Williams' illness and condition.

(b) The defendants failed to refer/failed to timely refer Lawrence Leroy Williams to medical personnel, including medical and/or surgical consultants, who possessed proper skill and training to treat Lawrence Leroy Williams' medical/surgical problem(s)/condition(s).

(c) The defendants failed to properly and/or timely test.

(d) The defendants negligently failed to provide appropriate medical and/or surgical treatment to Lawrence Leroy Williams and negligently treated Lawrence Leroy Williams.

(e) The defendants failed to obtain proper and informed consent for the treatment rendered to Lawrence Leroy Williams.

(f) The defendants failed to properly and/or timely communicate with each other and/or failed to properly Order and/or timely administer proper medication(s) to Lawrence Leroy Williams.

(g) The defendants failed to properly assess Lawrence Leroy Williams' condition.

(h) The defendants failed to properly interpret Lawrence Leroy Williams' neurological status.

(i) The defendants failed to and/or failed to timely perform and/or recommend proper radiologic testing and/or imaging studies:

(j) The defendants failed to properly monitor Lawrence Leroy Williams' neurological status.

(k) The defendants failed to properly and/or timely place and/or transfer Lawrence Leroy Williams within defendant, St. Joseph's Regional Medical Center.

(l) The defendants failed to provide proper care to Lawrence Leroy Williams to prevent injury to Lawrence Leroy Williams.

(m) The defendants were otherwise negligent and careless and otherwise deviated from generally accepted medical standards in the treatment of Lawrence Leroy Williams.

15. As a proximate result of the negligence of the defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present

identities are unknown, Lawrence Leroy Williams was caused to die.

16. Such deviations additionally increased the likelihood of harm from Plaintiff's pre-existing injury and such deviations additionally were a substantial factor in Plaintiff, LAWRENCE LEROY WILLIAMS, suffering injury, including, but not limited to, death,

17. One or more defendants were additionally negligent in not performing and/or not ordering the performance of diagnostic test(s). The failure to properly test increased the risk of harm from Plaintiff, LAWRENCE LEROY WILLIAMS, pre-existing condition.

WHEREFORE, plaintiff, PAMELA WILLIAMS, as the Administrator and Administrator Ad Prosequendum of the Estate of LAWRENCE LEROY WILLIAMS, and Individually, demands entry of judgment against the defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present identities are unknown, for damages, interest, attorneys' fees and costs of suit as provided by the New Jersey Wrongful Death Statute, N.J.S.A. 2A:31-1, et seq., and as otherwise provided by law.

SECOND COUNT

1. Plaintiff repeats and re-pleads each and every allegation contained in the first count of the Complaint as if same were repeated at length herein.

2. As a result of the aforementioned negligence of the defendants, the plaintiff's decedent, LAWRENCE LEROY WILLIAMS, was caused to suffer greatly prior to his death.

WHEREFORE, plaintiff, PAMELA WILLIAMS, as the Administrator and Administrator Ad Prosequendum of the Estate of LAWRENCE LEROY WILLIAMS, and Individually, demands entry of judgment against the defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present identities are unknown, for damages, interest, attorneys' fees and costs of suit as provided by N.J.S.A. 2A:15-3, et seq., and as otherwise provided by law.

**THIRD COUNT**

1. Plaintiff repeats and re-pleads each and every allegation contained in the first through second counts of the Complaint as if same were set forth at length herein.

2. As a proximate result of the negligence of the defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present identities are unknown, the Estate of LAWRENCE LEROY WILLIAMS has incurred hospital, medical and funeral expenses.

WHEREFORE, plaintiff, PAMELA WILLIAMS, as the Administrator and Administrator Ad Prosequendum of the Estate of LAWRENCE LEROY WILLIAMS, and Individually, demands entry of judgment against the defendants for damages, interest, attorneys' fees, costs of suit and such other relief as the court deems equitable and just.

**FOURTH COUNT**

1. Plaintiff repeats and re-pleads each and every allegation contained in the first through third counts of the Complaint as if same were set forth at length herein.

2. At all relevant times, the defendants, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10, were the agents, servants and/or apparent employees of the defendant, ST. JOSEPH'S REGIONAL MEDICAL CENTER, and/or ABC Corporations 1-5, fictitious names whose present identities are unknown, and were acting in the scope of their employment with ST. JOSEPH'S REGIONAL MEDICAL CENTER, and/or ABC Corporations 1-5, fictitious names whose present identities are unknown, when he/she/they deviated from accepted standards of care.

3. As a result of the relationship between the defendants, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on

3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10, the defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, and/or ABC Corporations 1-5, fictitious names whose present identities are unknown, are responsible for the negligence of the defendants, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10.

WHEREFORE, plaintiff, PAMELA WILLIAMS, as the Administrator and Administrator Ad Prosequendum of the Estate of LAWRENCE LEROY WILLIAMS, and Individually, demands entry of judgment against the defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff



hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present identities are unknown, for damages, interest, attorneys' fees, costs of suit and such other relief as the court deems equitable and just.

#### FIFTH COUNT

1. Plaintiffs repeat and re-plead each and every allegation contained in the first through fourth counts of the Complaint as if same were set forth at length herein.

2. The defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present identities are unknown, failed and/or refused to provide the minimum amount of information necessary in order for the plaintiff, LAWRENCE LEROY WILLIAMS, to provide informed consent.

3. As a proximate result of the negligence and other wrongful

conduct of the defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present identities are unknown, LAWRENCE LEROY WILLIAMS, was caused to die.

WHEREFORE, plaintiff, PAMELA WILLIAMS, as the Administrator and Administrator Ad Prosequendum of the Estate of LAWRENCE LEROY WILLIAMS, and Individually, demands entry of judgment against the defendants, ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.), JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), JOHN DOE, M.D., 3-10, JANE DOE, M.D. 1-5, JOHN DOE, R.N. 1-5, JANE DOE, R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1 -10 AND ABC-XYZ CORPORATION 1-10, fictitious names whose present identities are unknown, for damages, interest,

attorneys' fees, costs of suit and such other relief as the court deems equitable and just.

SEIGEL CAPOZZI LAW FIRM, LLC

By: 

Douglas S. Grossbart, Esq.  
Attorneys for Plaintiff

DATED: January 28, 2015

**JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues so triable.

**DEMAND FOR ANSWERS TO INTERROGATORIES**

Demand is hereby made for fully responsive answers to Form C and Form C(3) Interrogatories appearing in Appendix II to the Rules of Court. Please take notice that the information requested in the interrogatories may be necessary to prepare an Affidavit of Merit. Without the responses to these interrogatories, plaintiff may be unable to prepare an Affidavit of Merit and may be required to serve a sworn statement in lieu of an Affidavit of Merit pursuant to N.J.S.A. 2A:53A-26 et seq.

**DESIGNATION OF TRIAL COUNSEL**

Edward P. Capozzi, Esq. is hereby designated as Trial Counsel pursuant to R 4:25-4.

SEIGEL CAPOZZI LAW FIRM, LLC

By: 

Douglas S. Grossbart, Esq.  
Attorneys for Plaintiff

DATED: January 28, 2015

**DEMAND FOR DISCOVERY OF INSURANCE INFORMATION**

Pursuant To Rule 4:10-2(b), demand is hereby made that defendants disclose to plaintiffs' attorneys whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment and provide plaintiffs' attorneys with true copies of such insurance agreements or policies including, but not limited to, any and all declaration sheets. This demand shall be deemed to include and cover not only primary coverage but also any and all excess, catastrophic and umbrella policies.

**CERTIFICATION**

I HEREBY CERTIFY that, to the best of my knowledge, the subject matter of the cause of action herein is not the subject of any other action pending in any court or of any pending arbitration proceeding and that no other court proceedings or arbitration proceedings are contemplated and that no other parties need be joined.

SEIGEL CAPOZZI LAW FIRM, LLC

By: 

Douglas S. Grossbart, Esq.  
Attorneys for Plaintiff.

DATED: January 28, 2015

# State of New Jersey Passaic County Surrogate's Court

-----  
In the Matter of the Estate of  
Lawrence Leroy Williams, Deceased

(aka: )  
-----


ADMINISTRATION  
AD PROSEQUENDUM  
CERTIFICATE  
Docket No. 208739

I, Hon. Bernice Toledo, Surrogate of Passaic County and State of New Jersey, do certify that on August 7th, 2014, Letters of Administration Ad Prosequendum were granted to Pamela Williams who is/are authorized to bring an action, institute a proceeding or make a claim in decedent's name as such Administrator(s) Ad Prosequendum concerning the alleged wrongful death of Lawrence Leroy Williams, deceased, as in the Statute such case provided.

I further certify that said Letters of Administration Ad Prosequendum remain in full force and effect.



WITNESS my hand and seal of office; on  
August 7th, 2014

  
Bernice Toledo, Surrogate

# State of New Jersey Passaic County Surrogate's Court

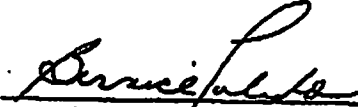
-----  
In the Matter of the Estate of  
Lawrence Leroy Williams, Deceased  
(aka: )  
-----

LETTERS OF ADMINISTRATION  
AD PROSEQUENDUM  
Docket No. 208739

I, Hon. Bernice Toledo, Surrogate of Passaic County and State of New Jersey, do certify that on August 7th, 2014, Administration Ad Prosequendum of decedent, Lawrence Leroy Williams, who died intestate, late of the County of Passaic and State of New Jersey was granted to Pamela Williams who is/are duly authorized to bring an action, institute a proceeding or make a claim in his/her/their name as such Administrator(s) Ad Prosequendum as in the statute such case provided.



WITNESS my hand and seal of office, on  
August 7th, 2014

  
Bernice Toledo, Surrogate




**NOTICE TO PRODUCE**

PLEASE TAKE NOTICE that pursuant to Rule 4:18 request is hereby made upon you to produce and permit this party to inspect and copy within thirty-five (35) days hereof, at the Law Offices of Seigel Capozzi Law Firm LLC, 505 Goffle Road, Ridgewood, New Jersey 07450 the following items and documentation:

1. The identity(ies) of the Attending Physician(s) at approximately 9:30 p.m. on 3/16/2014 as referenced in Exhibit 'A' attached hereto.
2. The current St. Joseph's Regional Medical Center Employment status of any individuals responsive to No. 1 above.
3. The last known address of any individuals identified in No. 1 above who are not currently employed by St. Joseph's Regional Medical Center.
4. The exact date any individual(s) referenced in No. 3 above were no longer employed by St. Joseph's Regional Medical Center.
5. The identity of the Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m. as referenced in Exhibit A.
6. The current St. Joseph's Regional Medical Center Employment status of any individuals responsive to No. 5 above.
7. The last known address of any individual identified in No. 5 above who is not currently employed by St. Joseph's Regional Medical Center.
8. The exact date any individual(s) referenced in No. 5 above were no longer employed by St. Joseph's Regional Medical Center.

9. The identity of the Nurse involved at the time Plaintiff hit his head on the I.V. pole as referenced in Exhibit A.
10. The current St. Joseph's Regional Medical Center Employment status of any individuals responsive to No. 9 above.
11. The last known address of any individuals identified in No. 9 above who are not currently employed by St. Joseph's Regional Medical Center.
12. The exact date any individual(s) referenced in No. 9 above were no longer employed by St. Joseph's Regional Medical Center.

SEIGEL CAPOZZI LAW FIRM LLC

  
\_\_\_\_\_

Douglas S. Grossbart

Attorney for Plaintiff

Dated: January 28, 2015

**EXHIBIT 'A'**

**St Joseph's**  
Healthcare System  
St. Joseph's Regional Medical Center  
St. Joseph's Wayne Hospital  
A Division of St. Joseph's Regional Medical Center  
St. Vincent's Nursing Home

**DOBCESS NOTES**  
Acct#: 40023441625 HRA: 0380076  
WILLIAMS, LAWRENCE  
DOB: 1950 63 N  
Dr: SILVA, WALDIRMAR  
BRX

Lawrence Williams  
0380076

| DATE / TIME |   |
|-------------|---|
| 3/17/14     | PGY-7 Night Float   |
| 120AM       | Notified by RN, pt hit his head on the pump while he was being cleaned/changed. RN did not witness or hear pt hit head. I came to evaluate patient after he already received his sleeping pill. Pt is on Plavix & Lovexox. Pt does have small hematoma on medial part above eyebrow but no elicited tenderness. No abrasions or any other signs of trauma. Pt was do headache prior to hitting his head but states headache is relieved with Tylenol. Pt is currently comfortable in bed, sleeping. Will re-evaluate as needed. |
|             | Hossain <i>[Signature]</i><br>#0078   |
| 3/17/14     | Anesthesia  |
| 5:00am      | Called my medicine resident for acute respiratory distress/unresponsiveness. Pt T 02 sat 95%, BP 105/55, HR 60. Pt S response to sternal rub. Duct now E. Masegan #1, (1) gastric contents around cords, intubated E #8 ETT, 1mg vecw/ 100mg Lidocaine. (1) ETCOP, P1 = RLC, tube secured in place by respiratory therapist. (1) Gastric contents suctioned from ETT. O2 sat 100%. recommend CXR to confirm placement.  |
|             | <i>[Signature]</i> #0021<br>Wojcik  |

PROGRESS NOTES

PLEASE WRITE LEGIBLY

PROGRESS NOTES



**SEIGEL CAPOZZI LAW FIRM, LLC**  
505 Goffle Road  
Ridgewood, New Jersey 07450  
Telephone No.: 201-444-4000  
Facsimile No.: 201-444-7717  
Attorneys for Plaintiff

**PAMELA WILLIAMS, as Administrator Ad  
Prosequendum of the ESTATE OF  
LAWRENCE LEROY WILLIAMS,**

*Plaintiffs*

v.

**ST. JOSEPH'S REGIONAL MEDICAL  
CENTER, DR. HOSSAIN, WALDEMAR  
SILVA, M.D., BENEDICTA JIMENEZ,  
R.N., MARY ANN YUMUL, R.N.,  
KATHLEEN HORTELANO, R.N.,  
VALERIE SIFUENTES, PCA, JOHN DOE,  
M.D.-1 (Attending Physician at  
approximately 9:30 p.m. on 3/16/2014),  
JOHN DOE, M.D. - 2 (Physician co-signing  
Dr. Hossain's 3/17/14 note timed at 1:20  
a.m.), JANE DOE, R.N. - 1 (Nurse involved  
at time Plaintiff hit his head on I.V. pole),  
JOHN DOE, M.D., 3-10, JANE DOE, M.D.  
1-5, JOHN DOE, R.N. 1-5, JANE DOE,  
R.N., 2-5, JOHN DOE, 1-10, JANE DOE, 1  
-10 AND ABC-XYZ CORPORATION 1-10,**

*Defendants*

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION:**

Docket No.:

**CIVIL ACTION  
(medical malpractice)**

**AFFIDAVIT OF MERIT**

STATE OF NEW JERSEY :  
: SS  
COUNTY OF CAMDEN :

John Kirby, M.D., of full age, being duly sworn according to law, upon his oath,  
deposes and says:

1. I am a licensed Physician in the State of New Jersey and Board Certified in Internal Medicine.

2. During the year immediately preceding the date of the occurrence that is the basis for the claim or action, I have devoted a majority of my professional time to either (a) the active clinical practice of Internal Medicine; or (b) the instruction of students in an accredited medical school, other accredited health professional school or accredited residency or clinical research program in Internal Medicine; or (c) both.

3. I have no financial interest in the outcome of this case.

4. I have reviewed the following records of LAWRENCE LEROY WILLIAMS:

a. Records of St. Joseph's Regional Medical Center, admission, 3/10/2014-3/24/2014;

5. Based upon the records which I have reviewed and/or the facts of this matter, there is a reasonable probability that the care, skill or knowledge exercised or exhibited by ST. JOSEPH'S REGIONAL MEDICAL CENTER, DR. HOSSAIN, WALDEMAR SILVA, M.D., BENEDICTA JIMENEZ, R.N., MARY ANN YUMUL, R.N., KATHLEEN HORTELANO, R.N., VALERIE SIFUENTES, PCA, JOHN DOE, M.D.-1 (Attending Physician at approximately 9:30 p.m. on 3/16/2014), JOHN DOE, M.D. - 2 (Physician co-signing Dr. Hossain's 3/17/14 note timed at 1:20 a.m.) and JANE DOE, R.N. - 1 (Nurse involved at time Plaintiff hit his head on I.V. pole), in the treatment of LAWRENCE LEROY WILLIAMS fell outside acceptable professional or occupational standards or treatment practices.

I HEREBY CERTIFY that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

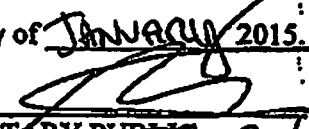
DATED:

  
John Kirby, M.D.

Sworn and Subscribed

Before me this 20

Day of JANUARY 2015.

  
~~NOTARY PUBLIC~~

Richard J. Talbot, Esq.



NOTICE:

A Horney-At-Law NJ and PA

If any defendant contends that this Affidavit of Merit fails to completely satisfy the requirements of the Affidavit of Merit Statute and/or The New Jersey Medical Care Access and Responsibility and Patients First Act of 2004, N.J.S.A. 2A:53a-38 et Seq. in any way, demand is hereby made that the defendant immediately notify the plaintiff of any such alleged deficiencies so that same may be corrected if necessary and within the time constraints of N.J.S.A. 2A:53A-26 et seq.



## Appendix XII-B1

|  |   |  |   |   |
|--|---|--|---|---|
|   | <b>CIVIL CASE INFORMATION STATEMENT (CIS)</b><br><br>Use for initial Law Division<br>Civil Part pleadings (not motions) under Rule 4:5-1<br>Pleading will be rejected for filing, under Rule 1:5-6(c),<br>if information above the black bar is not completed<br>or attorney's signature is not affixed |  | <b>FOR USE BY CLERK'S OFFICE ONLY</b><br>PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA<br>CHG/CK NO.:<br><br>AMOUNT:<br><br>OVERPAYMENT:<br><br>BATCH NUMBER: |   |
|  | ATTORNEY / PRO SE NAME<br>Douglas S. Grossbart, Esq.  |  | TELEPHONE NUMBER<br>(201) 444-4000  |   |
|  | FIRM NAME (if applicable)<br>Seigel Capozzi Law Firm  |  | COUNTY OF VENUE<br>Passaic  |   |
|  | OFFICE ADDRESS<br>505 Goffle Road<br>Ridgewood, NJ 07450  |  | DOCKET NUMBER (when available)<br><i>L-289-15</i>   |   |
|  |   | DOCUMENT TYPE<br>Complaint   |   | JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| NAME OF PARTY (e.g., John Doe, Plaintiff)<br>Pamela Williams, as Admin. Ad Prosequendum of the Estate of Lawrence Leroy Williams, Plaintiff  |   | CAPTION<br>Pamela Williams v. St. Joseph's Medical Center, Dr. Hossain, Waldemar Silva, M.D., Benedicta Jimenez, R.N., Mary Ann Yumul, R.N., Kathleen Hortelano, R.N., Valerie Sifuentes, PCA, et al.  |   |   |
| CASE TYPE NUMBER<br>(See reverse side for listing)<br>604  | HURRICANE SANDY RELATED?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   | IS THIS A PROFESSIONAL MALPRACTICE CASE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO<br>IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT. |   |   |
| RELATED CASES PENDING?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  |   | IF YES, LIST DOCKET NUMBERS  |   |   |
| DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO   |   | NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known)<br><input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN  |   |   |
| <b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>   |   |  |   |   |
| CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION  |   |  |   |   |
| DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  |   | IF YES, IS THAT RELATIONSHIP:<br><input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain)<br><input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS               |   |   |
| DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  |   |  |   |   |
| USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION  |   |  |   |   |
|  DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |   | IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION  |   |   |
| WILL AN INTERPRETER BE NEEDED?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO  |   | IF YES, FOR WHAT LANGUAGE?   |   |   |
| I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).    |   |  |   |   |
| ATTORNEY SIGNATURE <i>D. Grossbart</i>   |   |  |   |   |

Side 2



# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

## CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

### Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 605 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 606 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

### Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

### Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 802 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 608 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

### Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 158 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

### Multicounty Litigation (Track IV)

- |  |   |
|--|---|
| 266 HORMONE REPLACEMENT THERAPY (HRT)  | 288 PRUDENTIAL TORT LITIGATION                            |
| 271 ACCUTANE/ISOTRETINOIN              | 289 REGLAN  |
| 274 RISPERDAL/SEROQUEL/ZYPREXA         | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION                |
| 278 ZOMETHA/AREXIA                     | 291 PELVIC MESH/GYNECARE                                  |
| 279 GADOLINIUM                         | 292 PELVIC MESH/BARD                                      |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 293 DEPUY ASR HIP IMPLANT LITIGATION                      |
| 282 FOSAMAX                            | 295 ALLODERM REGENERATIVE TISSUE MATRIX                   |
| 284 NUVARING                           | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS       | 297 MIRENA CONTRACEPTIVE DEVICE                           |
| 288 LEVAQUIN                           | 601 ASBESTOS  |
| 287 YAZ/YASMIN/OCELLA                  | 623 PROPECIA  |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59

PASSAIC SUPERIOR COURT  
PASSAIC COUNTY COURTHOUSE  
77 HAMILTON STREET  
PATERSON NJ 07505

**TRACK ASSIGNMENT NOTICE**

COURT TELEPHONE NO. (973) 247-8176  
COURT HOURS 8:30 AM - 4:30 PM

DATE: JANUARY 30, 2015  
RE: WILLIAMS VS ST JOSEPHS REGIONAL MEDICAL CEN  
DOCKET: PAS L -000289 15

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON RUDOLPH A. FILKO

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001  
AT: (973) 247-8205.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDAN  
WITH R.4:5A-2.

ATTENTION:

ATT: EDWARD P. CAPOZZZI  
SEIGEL CAPOZZI LAW FIRM LLC  
505 GOFFLE ROAD  
RIDGEWOOD NJ 07450-4044

JUCVI